

WALLER LANSDEN DORTCH & DAVIS

A PROFESSIONAL LIMITED LIABILITY COMPANY

NASHVILLE CITY CENTER

511 UNION STREET, SUITE 2100

POST OFFICE BOX 198966

NASHVILLE, TENNESSEE 37219-8966

(615) 244-6380

FAX (615) 244-6804

www.wallerlaw.com

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WALLER LANSDEN DORTCH & DAVIS

A PROFESSIONAL LIMITED LIABILITY COMPANY

809 SOUTH MAIN STREET

POST OFFICE BOX 1035

COLUMBIA, TENNESSEE 38402-1035

(931) 388-6031

WALLER LANSDEN DORTCH & DAVIS, LLP
AFFILIATED WITH THE PROFESSIONAL LIMITED LIABILITY COMPANY
520 SOUTH GRAND AVENUE, SUITE 800
LOS ANGELES, CALIFORNIA 90071
(213) 362-3680

D. Billye Sanders
(615) 850-8951
bsanders@wallerlaw.com

May 10, 2004

VIA HAND DELIVERY

Deborah Tate, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37219

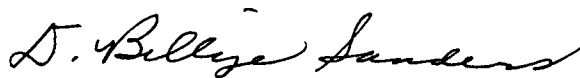
Re: Petition of Chattanooga Gas Company for Approval of Adjustment
of its Rates and Charges and Revised Tariff
Docket Number 04-00034

Dear Chairman Tate:

Enclosed you will find Chattanooga Gas Company's Responses and Objections to
Chattanooga Manufacturer's Association discovery respectfully, in the above referenced
docket.

Please contact me if you have any questions.

Sincerely,



D. Billye Sanders
Attorney for Chattanooga Gas Company

DBS/hmd
Enclosures

cc: Parties of record
Archie Hickerson
Steve Lindsey
John Ebert, Esq.
Elizabeth Wade, Esq.

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE:

PETITION OF CHATTANOOGA GAS)	
COMPANY FOR APPROVAL OF)	
ADJUSTMENT OF ITS RATES AND)	DOCKET NO. 04-00034
CHARGES AND REVISED TARIFF)	

**CHATTANOOGA GAS COMPANY'S RESPONSES TO BE THE DISCOVERY
REQUESTS OF CHATTANOOGA MANUFACTURERS' ASSOCIATION**

Attached hereto are Chattanooga Gas Company's ("Chattanooga Gas") Responses to the Discovery Requests of the Chattanooga Manufacturers' Association ("CMA"), dated April 26, 2004.

GENERAL OBJECTIONS

1. Pursuant to Tennessee Regulatory Authority ("TRA") Rule 1220-1-2-.11(5) Chattanooga Gas objects to the discovery requests, including subparts, that exceed 40. TRA Rule 1220-1-2.11(5) (a) states:

....If a party is served with more than forty (40) discovery requests without an order authorizing the same, such party need only respond to the first forty (40) requests.

Therefore Chattanooga Gas has responded to the first 40 questions, which, including subparts, end with the question in Discovery Request Number 14.

2. Chattanooga Gas objects to the CMA's Discovery Requests to the extent that they request information which is beyond the scope of TRA Rule 1220-1-2-.11 and Rules 26, 33 and 34 of the Tennessee Rules of Civil Procedure.

3. Chattanooga Gas objects to the CMA's discovery requests to the extent that they seek to curtail any privilege or immunity that is lawfully available to Chattanooga Gas

4. Chattanooga Gas Company incorporates by reference these general objections in response to all discovery requests, to the extent applicable.

Respectfully submitted,

Chattanooga Gas Company

By: D. Billye Sanders
D. Billye Sanders, Esq.

Waller Lansden Dortch & Davis
A Professional Limited Liability Company
511 Union Street, Suite 2100
Nashville, TN 37219-8966
(615) 244-6380

Its Attorney

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of May 2004, a true and correct copy of the foregoing Petition was served on the persons below by hand delivery or by placing same in the U.S. mail, postage pre-paid:

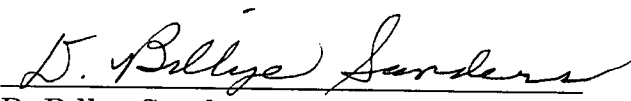
Vance Broemel
Assistant Attorney General
Tim Phillips
Assistant Attorney General
Office of Attorney General
Consumer Advocate and Protection Division
2nd Floor
425 5th Avenue North
Nashville, TN 37243-0491
Timothy.Phillips@state.tn.us
Vance.Broemel@state.tn.us

David C. Higney, Esq.
Grant, Konvalinka & Harrison, P.C.
633 Chestnut Street, 9th Floor
Chattanooga, TN 37450-0900
423-756-8400 (phone)
423-756-0643 (fx)
dchinge@gkhpc.com

Mailing address:
P O. Box 20207
Nashville, TN 37202

Henry M. Walker, Esq.
Boulton Cummings, Connors & Berry, PLC
414 Union Street, Ste 1600
Nashville, TN 37219
615-244-2582 (phone)
615-252-6380 (fax)
hwalker@boultoncummings.com

Dale Grimes, Esq.
Bass, Berry & Sims PLC
AmSouth Center
Suite 2700
315 Deaderick Street
Nashville, TN 37238
dgrimes@bassberry.com


D. Billye Sanders